

NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
NAVAJO SUPERFUND PROGRAM
FISCAL YEAR 2008 WORK PLAN

SECTION I - INTRODUCTION

The Navajo Nation Environmental Protection Agency (NNEPA) is the designated authority for all activities within or affecting the Navajo Nation relating to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

The Navajo Nation is requesting a continued financial assistance from the United States Environmental Protection Agency (EPA) Region 9 under its existing Superfund Consolidated Cooperative Agreement Grant in the amount of \$250,000 for the Superfund Preliminary Assessment/Site Inspection (PA/SI) Program, and \$20,000 for SACA grant for Northeast Church Rock (NECR) activities, with a total of 270,000. The financial assistance is for the period beginning October 01, 2007 ending September 30, 2008.

SECTION II - NEED FOR FINANCIAL ASSISTANCE

The NNEPA's Navajo Superfund Program (NSP) will continue to coordinate all Superfund-related projects and facilitate the continuation of the site assessment activities on the Navajo Nation. The administrative oversight and management of the Superfund Consolidated Cooperative Agreement Grant activities such as, budget, program, personnel and project management; enforcement program development, grant oversight and monitoring; and other administrative activities relating to Superfund can occur under the NSP's Brownfields Program.

NSP has six full time staff, split-funded (cost-shared) by funding sources consisting of PA/SI, Brownfields, SACA, and USEPA, Region 6's Management Assistant Grants (See Table I). The following tasking only details the work activities under the Superfund Block Grant.

TASK A - Administration

Inputs The administration task primarily covers the routine offices duties such as: the development of the weekly, monthly, quarterly, and end of year report(s); review work plans; monitoring and maintaining field equipment, procurement process of field supplies; and attendance of NSP/NNEPA/EPA quarterly meetings.

The administrative tasking will include the following:

- Report on the status of each deliverable on the work plan
- Submit deliverable as designated on the work plan
- Ensure adequate staff and resources are available to perform PA/SI tasking.

Outputs:

- Develop four NSP/EPA Quarterly summary reports, table listing the work plan tasks and deliverables, and one NSP/EPA End of Year summary report, including time allocations and distributions submitted 30 days after the end of the fourth quarter (10/30/08).

- Assist in the development of a draft and finalize the FY09 NSP Work Plan and Budget to start February 2008 and the final plan due at the end of May 2008.
- Travel time for meeting or training activities.

See Table 3 TASK A – Administration

TASK B - Staff Development (Training and Conferences)

Inputs: The tasks listed under the Staff Development, requires a Training Plan for all NSP staff. The Environmental Program Supervisor for NSP will develop a training plan for all NSP staff, and will be made available to NSP staff. The training courses listed are proposed upon availability of funds and upon the approval of the Department Director of NNEPA Waste Regulatory Compliance Department. Staff training (on-site field orientation) will be provided by contractors or agencies providing services to NNEPA. In instances, where U.S. EPA contractors perform work on the Navajo Nation, the NSP staff will take opportunity to obtain training by participating in the EPA lead work activities. Where applicable, the deliverable for this task will be certificates of completion of the required training and/or conferences sponsored by U.S. EPA.

Outputs: The NSP Environmental Program Supervisor will develop a training plan to be shared with all NSP staffers to develop technical abilities. The attendance of each training course and conference will be documented in the appropriate quarterly report. See Table 4 TASK B - Staff Development.

Task C. Contaminated Structures Assessments

NSP will develop the “contaminated structures strategy” by working with USEPA who will conduct 70 structures assessment on the Navajo Nation in FY08.

Input: NSP will review known information/data on 70 potentially contaminated home sites as listed by “Contaminated Homes Project” by Uranium Education Program (UEP), and the “Contaminated Homes in Cane Valley”, by USEPA Las Vegas. NSP will develop a desk top survey, and confirm the locations of these structures for field screening activities using appropriate chapter contacts. NSP will provide this information to the USEPA Structure survey team who will conduct gamma radiation surveys each structure and determine potential remedial options.

Output: NSP will develop a “contaminated structures strategy”, which will specify project goals and action plan for use as a guidance tool. NSP will also develop a “NSP contaminated structures process” in FY08, which will be used as an SOP to address existing and new referrals on contaminated structures/homes. NSP will continually revise the “Contaminated Structures Strategy” to better fit the NSP approach on gamma radiation surveys on contaminated structures on the Navajo Nation. See Table 5

TASK D - Quality Assurance

Input: NSP staff will update the Navajo Quality Assurance Program Plan (QAPP) to include limited onsite sampling during NSP site assessment activities. NSP will include SOPs on field instrumentation proposed for sampling events.

Output: Update the NSP QAPP document to include limited field sampling activities under site assessments. Include SOPs for all NSP field instrumentation. See Table 6

TASK E - Site Screening Reports

Input: NSP staff will complete the remaining 24 Site Screening Reports from the FY07 workplan. All of the 32 sites identified for site screening in FY07 workplan are field visited and appropriate information collected, and inputted into e-files, but lacks internal review and printing on hard copies. An additional 40 hours per staff, for a total of four staff are estimated to complete the remaining sites screening reports

The data gathering activities on all Navajo Abandoned Uranium Mines (AUMs) sites will be coordinated with Navajo Abandoned Mine Lands to better understand their reclamation activities that occurred on site. Mines of these reclaimed areas will be included as part of the screening reports.

Output: The NSP staff will complete the remaining sites screenings from FY07, and will be submitted to the EPA Project Officer for review. Site screening reports will include field and GIS data. The EPA Project Officer will be consulted if additional time is needed for a specific site. See Table 7 TASK E – Site Screening Reports.

TASK F – Assistance on PA/SI Reports

Input: NSP staff will assist EPA in the development, and review of PA and SI reports for five aggregated AUM sites located on the Navajo Nation. NSP staff will provide recommendations towards the development, preparation, and final PA/SI reports. NSP staff will also provide any GIS data/information available at the request of EPA for the PA/SI reports.

The data gathering activities on all Navajo AUM sites will be coordinated with Navajo Abandoned Mine Lands to better understand their reclamation activities occurred on site. Mines of these reclaimed areas will be included as part of the reports.

Output: NSP will submit an electronic and hard copies of the PA/SI review and recommendations to EPA. See Table 8 TASK F – Review of PA/SI Reports.

TASK G – Distribution of NN AUM Reports

Input: NSP staff will distribute the “Overall Navajo Nation AUM Report” to all the Navajo Nation Chapters. NSP staff will use the best means possible such as attending the Agency Council Meetings to distribute the “Overall Navajo Nation AUM Report” contained in a DVD report

NSP will provide a brief presentation on contents of the DVD package. Other means of distribution will be to travel to individual chapters and give the DVD package to chapter official individually

Output: NSP will provide a update report on the distribution progress of each chapter DVD package. See Table 9 TASK G – Review of Navajo Nation Chapter AUM Reports.

TASK H - Database & Information Management

Input: For FY08, the Geographic Information System Analyst (GISA) is responsible for the managing and maintaining of NSP computers and database, which includes the following:

- A. The Hardware and Software Procurement, installation, upgrade, update, for operations and maintenance of:
1. NSP Personal Computers and peripherals
 2. Local and Wide Area Networking
 3. Global Positioning System (GPS)

B. Software installation, upgrade, update, development, and operation & maintenance of:

1. Financial Management Information System
2. Identify and list all financial, administrative, and time allocation projects for input into a database for electronic accessibility
3. Revise and update the NSP Time Allocation format
4. Ongoing Web Page Updates
 - NAUM site records
 - Sheep Dip Vats site records
5. Provide selected NSP site records for public dissemination through the Internet
6. Electronic Mail

C. Continue to manage the Sites Information Database (SID) for input and upgrade of the following NSP site information:

1. Identify list and categorize all NSP site data files for input to SID
2. Continue to identify list and categorize the site data files for the Navajo Nation Chapters identified in the NSP/USEPA's AUM-MOU Desktop project.
3. Continue the input of geographic (GPS) data into the SID, which will capture, store, update, manipulate, analyze, and display all forms of geographically referenced information on NSP site files.
4. Continue and identify all NSP site files and categorize the data for input into the SID for electronic accessibility;
5. Coordinate and facilitate the development and maintenance of GIS maps to including the following:

- a) Review and comment on AUM Desktop data provided by U.S. EPA and U.S. Army Corp of Engineers;
- b) Clearinghouse for NSP sites that were considered, investigated, referred as part of NSP's tracking systems for future land use planning activities.

c) Data for both Site and GIS databases from the previous years to present will be the deliverable on CD-ROM. NSP and EPA will negotiate data fields to be deleted that contain sensitive information. Due within 30 days of the grant ending period (10/30/09).

D. Continue development and upgrade the Geographic Information System Database (GISD) to input and manage the following GIS site information:

1. Provide site-specific information to Navajo Housing Authority (NHA) or other contractors on the determination of Superfund and CERCLA site locations that might have an impact on their housing project sites
2. Provide input and/or assistance to NNEPA programs for Multi-Media investigations.
3. Participate in field data collection and sampling activities.
4. Transport all radiological and GPS survey data into Arc View or ArcGIS and generate site-specific maps.

Output: NSP staff will provide a report on status of NSP web page and progress reports of site databases, including any orientation for NSP staff in the operation of new software programs, new computers, printers, plotters and attending required meetings and trainings. See Table 10 TASK H - Database & Information Management.

TASK I: Technical Assistance

Input: The NSP staff will continue to collaborate with U.S. EPA, U.S. Army Corp of Engineer, Bureau of Indian Affairs (BIA), and other Navajo Nation entities associated with various environmental projects to coordinate and handle mutually agreed upon projects on the Navajo Nation. The tasks may relate to NNEPA projects, e.g., SDV, AUM, Multi-media sites, or other EPA projects. These tasking are as follows:

a. **Generic Information Sharing** - During the course of the fiscal year, NSP will be asked to provide input and/or assistance on various issues and document reviews by Navajo Nation Departments, including NNEPA Programs. On a limited basis, NSP will provide assistance to the NNEPA Public Water System program on their Navajo Nation wide water sampling initiatives for radionuclides. NSP will provide recommendations for water sources to be sampled under this water sampling initiatives.

b. **Community Outreach** - Informing the public of NSP activities within their communities has been increasingly emphasized by NNEPA. The NSP staff will be conducting such activities at NSP and at EPA-led projects. Other outreach activities include NNEPA's requirement to perform Chapter presentations, participating in environmental fairs, and assisting with environmental related educational outreaches, events, e.g., Earth Day activities.

c. **Other Technical Assistance** - As it relates to PA/SI activities, other assistance will be provided to Navajo Nation entities. These technical activities such are:

Outputs: Under this grant, the Navajo Superfund Program will produce the following site outputs: site identification, site screening and site assessment. In addition, outputs will include the production of maps, the development of site reports and review summaries and participation in

Intermediate Outcome: The intermediate outcome associated with this grant is information gathered on sites that may need cleanup. Information gathered on the site will allow the Navajo Superfund Program to make decisions or recommendations on what additional work is necessary on each site. These actions include the following options: no further action needed, referral to another program, and further investigation warranted. The intermediate outcome of information and decisions will be achieved by a variety of outputs by the Navajo Superfund Program.

Outcome: The outcome associated with this grant is the cleanup of contaminated sites (and contaminated dwelling were necessary under removal program). Sites that contain hazardous waste or hazardous material that do now or may present an exposure risk to people or to the environment require evaluation and an appropriate response action. Evaluation is important to understand the problem at the site and response is important to eliminate or reduce to an acceptable level the risks presented by the site. To reach the outcome of site cleanup, intermediate outcomes are often required as part of the process.

SECTION III – ENVIRONMENTAL RESULTS SUMMARY

Output: Reports on 1) NSP work collaboration with federal/tribal agencies, 2) Any chapter/community outreach activities; 3) the AUM Collaborative Group meetings; 4) Desktop Survey coordination efforts with NAML NMED, NMM&M, US EPA and NNEPA staff; 5) Updates on the AUM MOU and AUM and Use of technical hours for contingency hours and 5) Updates on the AUM MOU and AUM PMP Documents. See Table 11, TASK I – Technical Assistance.

1. Provide mentoring and orientation to NNEPA Programs who are assisting PA/SI and USEPA, i.e., input on sampling event preparations and/or follow-ups, staff orientation on instrumentation and equipments use, updates on personal protection equipment (PPE), mock drills.
2. Assist the chapter with project review and point out environmental concerns through project presentations. Provide input and assistance to the NNEPA Multi-media Programs relating to hazardous waste projects.
3. Participation in the AUM Collaborative Group to provide assistance in the review of analytical and technical documents for studies relating to: Chapter sponsored activities such as air monitoring and radiation impact studies; Navajo Health Boards and Navajo chapters meetings on AUM issues.
4. Contingency hours for use if additional time is needed for the NSP activities, such as onsite screening, home assessments activities, report writing, and review of various technical documents for comment
5. Maintain and update the NSP AUM Strategy Document and the AUM Project Management Plan to enhance AUM work efforts of NSP and Navajo Abandoned Mine Lands Program.
6. Work in collaboration with USEPA, NMEB, NMM&M, and NAMLRD to address the AUMs located on private lands within the Navajo Land boundaries (Indian Country) to address the clean-up, and/or reclamation to include seeking funding sources and the Navajo contaminated homes. This is where we may include any work/meetings for Section 17 site.

community meetings. The outputs associated with this grant will be narrative and matrix chart portions of the Consolidated Superfund work Plan.

SECTION IV- BUDGET SUMMARY

The Navajo Nation Fiscal Year 2008 Budget Justification Detail by Object Code for CORE and PA/SI Program are attached to this Work Plan as Attachment B.

SECTION V - FUNDING CONDITIONS

Funding conditions applicable to the previous awards will continue under this award. It is understood that the EPA Region XI will amend the general and special conditions placed on this Superfund Block Grant as necessary to meet new or revised Federal Regulations and Guidance in effect at the time of award, and will notify NNEPA/NSP in writing for documentation of such changes.

The output will follow the US EPA's Environmental Results under EPA Assistance Agreements. In compliance with the Environmental Result Order, four quarterly meeting will be scheduled to ensure the NNEPA and USEPA complies with the Order.

SECTION VI: TABLES FY 08 SUPERFUND BLOCK GRANT (SBG) ACTIVITIES

Table 1 - NSP Personnel (SBG Cost-shared Positions)

NSP Staff (Positions)	FTE	PASI Hours	SACA Hours	Brown Fields* Hours	PWT /UNC** Hours	Total Person Hours
Chemist (CH)	1	1743	160	177	0	2080
Health Physicist (HP)	1	1733	0	347	0	2080
Environ. Prog. Supervisor (EPS)	1	1040	160	660	220	2080
Sr. Environmental Specialist (SrES)	1	0	0	2080	0	2080
GIS Analyst (GISA)	1	800	160	1,120	0	2080
Sr. Office Specialist (SrOS)	1	0	0	2080	0	2080
Total SBG Work Hours	6	5316	160	6,464	220	12480

COST-SHARED *Brownfield Grant, **US EPA R6 Grant. (NN Financial Information only)
 The following table details only hours associated with the SBG activities.

Table 2 - FY 08 PASI Work Tasks Hours Summary

Inputs	CH	HP	EPS	GISA	Total Hours
A. Administration	200	180	174	98	652
B. Staff Development	48	48	48	48	192
C. Contaminated Structures	535	535	408	248	1726
D. Quality Assurance	120	120	80	30	350
E. Site Screening Reports	40	40	40	40	160
F. Assistance on PASI Reports	80	80	8	16	184
G. Distribution of AUM Reports	40	40	40	40	160
H. Database/Information Mgmt	100	100	52	80	332
I. Technical Assistance	500	510	110	120	1240
NSP Leaves	80	80	80	80	320
Total SBG Work Hours	1743	1733	1040	800	5316

Table 3 – TASK A – Administration

Admin Requirements					
CH	HP	EPS	GISA	Total Hours	
200	180	174	98	652	Program and Project oversight and management activities, Attendance of NSP/NEPA/EPA/State meetings on superfund related issues; Preparation of NSP (Wkly, Mon, Qtrly, Yrly) Reports, Development of Budget and Work Plans, Oversight of Maintenance of Time Allocations Reports. Equipment Purchases & Supply Procurements. Personal Medical Monitoring & Maintenance Oversight req. by OSHA, Review, comments and provide summary on technical documents for administrative records; Provide Public Outreach for NSP Program (PR)

Table 4 – TASK B - Staff Development

Staff Development					
CH	HP	EPS	GISA	Total Hours	
8	8	8	8	32	8hr. HAZWOPER Refresher
40	40	40	40	160	National & Regional Site Assessment Conferences
48	48	48	48	192	Personnel Hours

Table 5 – TASK C – Contaminated Structures Assessment

Contaminated Homes Assessments					
CH	HP	EPS	GISA	Total Hours	
75	75	28	30	208	Review, identify, and prioritize contaminated home sites on NN. Staff to contact Chapters for information/site visits.
200	200	200	150	750	Assist EPA in conducting Home site surveys/removal assessments
10	10	10	8	38	Input contaminated home information into the AUM Database.
285	285	238	188	996	Personnel Hours

Table 6 - TASK D – Quality Assurance

Quality Assurance					
CH	HP	EPS	GISA	Total Hours	
40	40	40	15	135	Revise and update the NSP QAPP
80	80	40	15	215	Revise and update the NSP Instrumentation SOPs for QAPP.
120	120	80	30	350	Personnel Hours

Table 7- TASK E- Site Screening Reports					
Site Screening Report Input					
Total Hours	CH	HP	EPS	GISA	
120	30	30	30	30	Complete remaining 24 site screens from FY07
					worplan.
0	0	0	0	0	Develop GIS data and maps
40	10	10	10	10	Peer review and comments
0	0	0	0	0	Collaboration meetings with NAML on AUMs issues
0	0	0	0	0	and sites
Personnel Hours					
160	40	40	40	40	

Table 8 - TASK F - Assistance on PA/SI Reports

Assistance on PA/SI Reports					
Total Hours	CH	HP	EPS	GISA	
132	60	60	0	12	Provide assistance, and review of 5 aggregated PASI reports for USEPA for sites located on NN lands.
52	20	20	8	4	Peer review and comments
Personnel Hours					
184	80	80	8	16	

Table 9 - TASK G - Distribution of NN AUM Reports

Distribution of NN AUM Reports					
Total Hours	CH	HP	EPS	GISA	
160	40	40	40	40	Conduct Council Agency meetings (Community Outreach) with AUM DVD package
Personnel Hours					
160	40	40	40	40	

Table 10 - TASK H - Data Base & Information Management

Database & Information Input					
Total Hours	CH	HP	EPS	GISA	
100	30	30	0	40	Update and maintain the SID with all NSP sites records, land management planning or projects.
50	10	10	10	20	Provide assistance in data compilation and development with software orientations. Employ the AUM GIS database to prioritize work and as a decision making tool for NSP, update and maintain the database as a dynamic planning tool
182	60	60	42	20	Develop the GIS database. Progress Report that details NSP's database development progress.
Personnel Hours					
332	100	100	52	80	

Table 11 – TASK I - Technical Assistance

Technical Assistance		Input				
Total Hours	GISA	EPS	HP	CH	500	510
1240	120	110	510	500	<p>Generic Information Sharing: NSP assistance to NNEPA and NN.</p> <p>Community Outreach: Outreach activities to Navajo Nation Chapters. Contingency hours for NSP activities, and for technical document review and comment.</p> <p>Other Technical Assistance: Mentoring NNEPA programs, Chapter reviews, AUM Collaborative group concerns, updates for the AUM MOU and AUM PMP.</p> <p>Assist US EPA in other Superfund Removal action or enforcement</p>	
1240	120	110	510	500	<p>Personnel Hours</p>	